



June 6, 2018

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: Advanced Methods to Target and Eliminate Unlawful Robocalls, Notice of Proposed Rule Making, CG Docket No. 17-59, FCC Number 18-31

Ms. Marlene Dortch,

On behalf of GECU, the largest locally owned state-chartered credit union in El Paso, TX, this letter is in response to the Federal Communications Commission's (FCC) proposed changes to ensure a database is available to provide callers with information concerning reassigned numbers under the Telephone Consumer Protection Act. GECU currently serves a membership of over 376,000 with assets greater than \$2.6 billion. We appreciate the opportunity to comment on this very important issue.

GECU supports the proposal to create one or more databases where callers may obtain necessary information concerning reassigned numbers. A centralized database will be beneficial in assuring the contact with our members is in accordance with their wishes and in alignment with the requirements of the Telephone Consumer Protection Act while minimizing the costs associated with utilizing commercially available databases.

The information in the database should include at least the number that has been reassigned as well as the actual date the number was reassigned utilizing the name and telephone of the callers when seeking to search or query the database. It is recommended that this information be obtained from all types of service providers, including wireless, wireline, interconnected VoIP, and non-interconnected VoIP providers, and updated as close to real-time as possible, but no less frequently than monthly. Individual phone numbers are continually reassigned which supports updating the database as frequently as possible to ensure the integrity of the data.

The database should also include a process to allow for batch processing of multiple numbers at once and provide a method by which callers may export the information in a useable format, such as comma-separated values (CSV), to allow callers to update their internal systems with the information obtained from the database.

The FCC should also adopt a safe harbor protecting the liability of those callers that choose to utilize the reassigned number database. Congress has acknowledged that the Telephone Consumer Protection Act is in need of modernization to reflect current technology and business practices and there is no indication as to when this legislative action may be finalized. Should the FCC implement a database of reassigned numbers, credit unions will be able to communicate important messages to our members with less regulatory burden and less risk of non-compliance.

If you have questions regarding our comments, please contact me at (915) 774-8203.

Sincerely,



Crystal Long
President/CEO

CL: dp